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FILED

AUG 26 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

SHELBY SUMMER BROWN

)
) Criminal No. 19-261
) (18 U.S.C. §§ 2422(a) and 2;
) 18 U.S.C. § 371)
)
)

INFORMATION

COUNT ONE

The United States Attorney charges:

From on or about March 6, 2018, to on or about March 14, 2018, in the Western District of Pennsylvania and elsewhere, the defendant, SHELBY SUMMER BROWN, did knowingly persuade, induce, entice, and coerce an individual, Minor A (an individual who had not attained the age of 18 years), to travel in interstate commerce, from Ohio to Pennsylvania, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, and attempted to do so.

In violation of Title 18, United States Code, Sections 2422(a) and 2.

COUNT TWO

The grand jury further charges:

THE CONSPIRACY AND ITS OBJECTS

From on or about March 6, 2018, and continuing thereafter until on or about March 14, 2018, in the Western District of Pennsylvania and elsewhere, the defendant, SHELBY SUMMER BROWN, knowingly and willfully did conspire, combine, confederate and agree with Oscar Carter, to commit offenses against the United States, that is: to knowingly persuade, induce, entice, and coerce an individual, Minor A (an individual who had not attained the age of 18 years) to travel in interstate commerce to engage in prostitution or any illegal sexual activity, in violation of Title 18, United States Code, Section 2422(a).

MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that SHELBY SUMMER BROWN and Oscar Carter, together, recruited and persuaded Minor A to engage in commercial sex acts for the financial benefit of BROWN and Carter.

It was further a part of the conspiracy that BROWN and Carter used the Internet to promote the prostitution of Minor A in Pennsylvania, and elsewhere, by advertising her availability for commercial sex acts through the Internet and on the website "backpage.com."

It was further a part of the conspiracy that BROWN and Carter used telephones, vehicles, and hotels to manage, facilitate, and promote Minor A's prostitution services.

It was further a part of the conspiracy that BROWN and Carter engaged in interstate travel to coerce and facilitate the prostitution of Minor A.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, the defendant, SHELBY SUMMER BROWN, together with Oscar Carter, did commit and cause to

be committed, the following overt acts, among others, in the Western District of Pennsylvania and elsewhere:

(a) On or about March 6, 2018, in furtherance of the conspiracy, BROWN and Carter drove Minor A from Ohio to Pittsburgh, Pennsylvania, in a vehicle registered to BROWN, and with the intent that Minor A would engage in commercial sex acts in Pittsburgh, Pennsylvania.

(b) On or about March 6, March 7, March 8, March 9, March 10, March 11, March 12, March 13, and March 14, 2018, in furtherance of the conspiracy, Carter and BROWN paid for and caused advertisements for Minor A's commercial sex acts to be posted on the website "backpage.com."

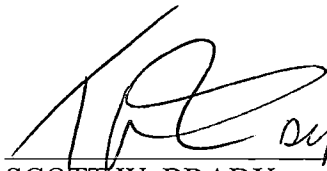
(c) On or about March 6, March 7, March 8, March 9, March 10, March 11, March 12, March 13, and March 14, 2018, in furtherance of the conspiracy, Carter obtained hotels rooms in and around Pittsburgh, Pennsylvania for Minor A to use for commercial sex services.

In violation of Title 18, United States Code, Section 371.

CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One and Two of this Information are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2428 and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant SHELBY SUMMER BROWN charged in Counts One and Two that, upon her conviction of such offense, the government will seek forfeiture: (a) in accordance with Title 18, United States Code, Section 2428(a)(1), which requires any person convicted of such offense(s) to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense(s); and (b) in accordance with Title 18, United States Code, Section 2428(a)(2), which requires any person convicted of such offense(s) to forfeit any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, including but not limited to the following: an LG model LGM5550 cellular phone s/n 612VTHJ804377.


SCOTT W. BRADY
United States Attorney
PA ID No. 88352

Deputy US Atty